

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

: CRIMINAL NO.

v.

: DATE FILED: _____

ANDRE THOMPSON
ANDRE COLEMAN

: VIOLATIONS:

: 18 U.S.C. § 371
(conspiracy - 1 count)
: 18 U.S.C. § § 2113(a)
(attempted bank robbery - 2 counts)
: 18 U.S.C. § 2113(d)
(armed bank robbery - 1 count)
: 18 U.S.C. § 924(c)
(carrying a firearm during and in
: relation to a crime of violence - 1 count)
18 U.S.C. § 2
: (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. In or about November 2004, in Norristown and Feasterville, Pennsylvania, in the Eastern District of Pennsylvania, defendants

ANDRE THOMPSON and
ANDRE COLEMAN

conspired and agreed, together and with others known to the grand jury, to commit offenses against the United States, that is, bank robbery, in violation of Title 18, United States Code, Section 2113(a), armed bank robbery, in violation of Title 18, United States Code, Section 2113(d), and using and carrying a firearm during and in relation to a crime of violence, in violation of Title 18, United States Code, Section 924(c).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendants **ANDRE THOMPSON** and **ANDRE COLEMAN**, together and with others known to the grand jury, on or about November 22, 2004. planned to rob the PNC Bank at 1770 Markley Street in Norristown, Pennsylvania, and the Univest National Bank at 40 East Street Road in Feasterville, Pennsylvania, of money by the use of force, threats of force, violence, and a dangerous weapon, that is, a handgun.

It was further part of the conspiracy that:

3. Defendants **ANDRE COLEMAN** and **ANDRE THOMPSON** carried a firearm to use during the bank robbery.

4. Defendants **ANDRE COLEMAN** and **ANDRE THOMPSON** wrote demand notes to use during the bank robbery.

OVERT ACTS

In furtherance of the conspiracy, the defendants, together and with others known to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania, on or about November 22, 2004:

5. Defendants **ANDRE COLEMAN** and **ANDRE THOMPSON** drove from Philadelphia to Norristown with the intention of committing a bank robbery.

6. Defendants **ANDRE COLEMAN** and **ANDRE THOMPSON** wrote out a demand note for use in the robbery of the PNC Bank at 1770 Markley Street in Norristown, Pennsylvania.

7. While defendant **ANDRE COLEMAN** waited in the car, defendant

ANDRE THOMPSON entered the PNC Bank, and in an attempt to rob the bank, handed the teller a demand note.

8. After attempting to rob the PNC Bank, defendants **ANDRE COLEMAN** and **ANDRE THOMPSON** drove around and chose to rob the Univest National Bank at 40 East Street Road in Feasterville, Pennsylvania.

9. Defendants **ANDRE COLEMAN** and **ANDRE THOMPSON** caused another individual known to the grand jury to go into the bank to check it out before robbing the bank.

10. While defendant **ANDRE COLEMAN** waited in the car, defendant **ANDRE THOMPSON** entered the Univest National Bank with a firearm.

11. Defendant **ANDRE THOMPSON** handed the Univest Bank teller a demand note, and took approximately \$4,255, which he put into a black bag.

12. Defendants **ANDRE COLEMAN** and **ANDRE THOMPSON** fled from the Univest Bank in a black Infiniti.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 19, 2004, in Norristown, in the Eastern District of Pennsylvania, defendant

ANDRE THOMPSON

knowingly and unlawfully, by force and violence, and by intimidation, attempted to take, and aided and abetted the attempt to take, from employees of PNC Bank, 1 West Main Street in Norristown, Pennsylvania, lawful currency of the United States, belonging to and in the care, custody, control, management and possession of the PNC Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 22, 2004, in Norristown, in the Eastern District of Pennsylvania, defendants

**ANDRE THOMPSON and
ANDRE COLEMAN**

knowingly and unlawfully, by force and violence, and by intimidation, attempted to take from employees of PNC Bank, 1770 Markley Street in Norristown, Pennsylvania, lawful currency of the United States, belonging to and in the care, custody, control, management and possession of the PNC Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 22, 2004, in Feasterville, in the Eastern District of Pennsylvania, defendants

**ANDRE THOMPSON and
ANDRE COLEMAN**

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of Univest National Bank, 40 East Street Road in Feasterville, Pennsylvania, lawful currency of the United States, that is approximately \$4,255, belonging to and in the care, custody, control, management and possession of the Univest National Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, and in so doing, defendants

THOMPSON and **COLEMAN** knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Univest Bank, and other persons, by use of a dangerous weapon, that is, a loaded Ruger revolver, serial number 160-95358.

In violation of Title 18, United States Code, Section 2113(d).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 22, 2004, in Feasterville, in the Eastern District of Pennsylvania, defendants

**ANDRE THOMPSON and
ANDRE COLEMAN**

knowingly used and carried a firearm, that is, a Ruger Service Six revolver, serial number 160-95358, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is armed bank robbery, in violation of Title 18, United States Code, Section 2113(d).

In violation of Title 18, United States Code, Section 924(c)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section 924(c), set forth in this indictment, defendants

**ANDRE THOMPSON and
ANDRE COLEMAN**

shall forfeit to the United States of America the firearms and ammunition involved in the commission of this offense, including, but not limited to:

Ruger Service Six revolver serial number 160-95358 and 6 rounds of
ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**